

Mr. Dave Elchert
Dadon Corporation DBA Merhow Industries
306 Depot Street
Bristol, IN 46507

Re: 039-12369
Notice-only change to
Registration 039-12075-00135

Dear Mr. Elchert:

Dadon Corporation DBA Merhow Industries was issued a registration on June 6, 2000 for a horse trailer manufacturing operation. On June 15, 200, the Office of Air Management determined that 326 IAC 8-2-9 and 326 IAC 2-6 was erroneously omitted from the registration. Pursuant to the provisions of 326 IAC 2-5.5-6 the permit is hereby revised as follows:

326 IAC 8-2-9 (Miscellaneous Metal Operations and 326 IAC 2-6 (Emissions Reporting) are added to the registration to reflect all applicable rules. These two (2) rules were determined to be applicable in the technical support document, but were erroneously omitted from the registration. The registration is revised as follows (bolded and crossed out for emphasis):

4. **Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.**

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

5. **Pursuant to 326 IAC 2-6 (Emission Reporting), the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).**

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nysa L. James, at (800) 451-6027, press 0 and ask for Nysa L. James or extension (3-6875), or dial (317) 233-6875.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

NLJ

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

Mr. Dave Elchert
Dadon Corporation DBA Merhow Industries
306 Depot Street
Bristol, Indiana 46507

Re: Registered Construction and Operation Status,
039-12075-00135

Dear Mr. Elchert:

The application from Dadon Corporation DBA Merhow Industries, received on March 22, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.1, it has been determined that the following horse trailer manufacturer, to be located at 306 Depot Street, Bristol, Indiana, is classified as registered:

- (a) One (1) air atomization paint booth, designated as S-1, with a maximum metal throughput of 0.375 units per hour, maximum paint usage of 19.05 pounds per hour, particulate matter controlled by dry filters and exhausts to one (1) stack designated as S-1.
- (b) Six (6) metal inert gas (MIG) welding stations, with a maximum aluminum wire consumption of 0.26 pounds per hour and exhaust to the atmosphere.
- (c) Six (6) metal inert gas (MIG) welding stations, with a maximum steel wire consumption rate of 1.55 pounds per hour and exhaust to the atmosphere.
- (d) Six (6) natural gas-fired radiant heaters, designated as H-1 through H-6, with a maximum heat input capacity of 0.175 mmBtu/hr each and exhaust to the atmosphere.
- (e) Five (5) natural gas-fired radiant heaters, designated as H-1 through H-6, with a maximum heat input capacity of 0.100 mmBtu/hr each and exhaust to the atmosphere.

The following conditions shall be applicable:

1. Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
2. Pursuant to the 326 IAC 6-3-2 (Process Operations), particulate matter (PM) from the paint booth designated as S-1, shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour.

The dry filters shall be in operation at all times the paint booth designated as S-1 is in operation, in order to comply with this limit.

3. Pursuant to the 326 IAC 6-3-2 (Process Operations), particulate matter (PM) from the twelve (12) MIG welding stations shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour;}$$

$$E_w (\text{welding}) = 4.10 * (1.88 \text{ lb/hr} * \text{ton} / 2000 \text{ lb})^{0.67} = 0.04 \text{ lb/hr.}$$

4. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

5. Pursuant to 326 IAC 2-6 (Emission Reporting), the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

This registration is the first air approval issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Management that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.1-2(f)(3). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Management
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Management (OAM) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

NLJ

cc: File - Elkhart County
Elkhart County Health Department
Air Compliance - Rick Reynolds
Permit Tracking - Janet Mobley
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3)

Company Name: Dadon Corporation DBA Merhow Industries
Address: 306 Depot Street
City: Bristol
Authorized individual: Dave Elchert
Phone #: 319-848-4445
Registration #: 039-12075-00135

I hereby certify that Dadon Corporation DBA Merhow Industries is still in operation and is in compliance with the requirements of Registration 039-12075-00135.

Name (typed):
Title:
Signature:
Date: